

REMARKS/ARGUMENTS

1.) Claim Amendments

Claims 1-9, 11, 16, 19, 20, 31-36 and 38 are pending in the application. Favorable reconsideration of the application is respectfully requested in view of the following remarks.

2.) Claim Rejections – 35 U.S.C. § 103(a)

The Examiner rejected claims 1-9, 11, 16, 19, 20, 31-36 and 38 under 35 U.S.C. § 103(a) as being unpatentable over Johansson (US 2002/0080752) in view of Acharya, *et al.* (US 6,829,709).

The Applicants' claims are directed to a method and arrangement for access control for a movable network managed by a mobile router. The mobile router filters uplink packets to eliminate unauthorized packets before they are transmitted over the air interface. A mobility anchoring agent filters downlink packets in the same manner.

The Examiner cites Johansson for showing the mobility anchoring agent and mobile router, and cites Acharya for showing the filtering steps. The Applicants respectfully disagree.

Johansson relates to a route optimization technique, and shows only a home agent and a foreign agent, which cooperate to improve packet routing. Their function, therefore, is entirely different from the claimed invention in which the mobile router and mobility anchoring agent cooperate to eliminate the transmission of unauthorized packets.

The cited passages of Acharya (col. 4, lines 11-51; and FIG. 1) do not expressly disclose filtering to eliminate unauthorized packets prior to transmission over the air interface. Instead, Acharya states that the routers 101 and 113 perform "transformations" of the packets as they enter and as they leave the IP core network 107. The transformations may include compression, tunneling, or encryption or authentication functions. However, the Examiner also cites Acharya claim 5, which recites that a router is configured to form a filtering agent. However, there is no

disclosure or suggestion that the filtering agent is filtering out unauthorized packets prior to transmission over the air interface. Instead, the filtering agent is filtering a subset of the packets generated in a first end-station. There is no disclosure of how the filtered packets are selected. The filtered packets are returned to the first end-station for validation that transformations were properly done.

This type of filtering would not suggest to a person of ordinary skill that a mobile router could filter uplink packets to eliminate unauthorized packets before they are transmitted over the air interface, or that a mobility anchoring agent could filter downlink packets in the same manner. Therefore, the combination of Johansson's route optimization and Acharya's filtering agent does not establish a *prima facie* case of obviousness as defined in MPEP 2143.

Independent claims 1, 16, 31, and 38, as amended in the Applicants' previous response, expressly recite a mobile router that filters uplink packets to eliminate unauthorized packets before they are transmitted over the air interface, and a mobility anchoring agent that filters downlink packets before they are transmitted over the air interface. Therefore, the allowance of claims 1, 16, 31, and 38 is respectfully requested.

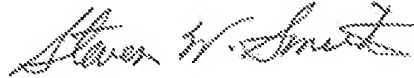
The remaining claims depend from the amended independent claims and recite further limitations in combination with the novel elements of the independent claims. Therefore, the allowance of claims 2-9, 11, 19, 20, and 32-36 is respectfully requested.

3.) Conclusion

In view of the foregoing remarks, the Applicants believe all of the claims currently pending in the Application to be in condition for allowance. The Applicants, therefore, respectfully request that the Examiner withdraw all rejections and issue a Notice of Allowance for claims 1-9, 11, 19, 20, 31-36 and 38.

The Applicants request a telephone interview if the Examiner has any questions or requires any additional information that would expedite the prosecution of the Application.

Respectfully submitted,



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